

## UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

JANE DOE, JOHN DOE

Plaintiffs

-against-

Case No.3:24-cv-274 (MAD/ML)

# JANE DOE AFFIDAVIT

JONATHAN REES aka GREG ELLIS  
aka JOHNATHAN REES aka JONNY REES  
aka JACOB LORENZO

Defendant

I, JANE DOE, being duly sworn, depose and say under the penalty of perjury:

1. I am the Plaintiff in the above-captioned matter and am proceeding pro se.
2. I submit this affidavit in support of my motion for subpoenas directed to GoDaddy.com llc, Domains by Proxy, Wordpress/Automattic Inc. NameCheap, and Bodis.
3. The documents sought through these subpoenas are necessary for the prosecution of my claims, specifically regarding the ownership and registration of certain websites tied to my allegations of retaliation, harassment and abuse by Defendant and his third party enabler friends required to determine damages at inquest.
4. I have made reasonable attempts to obtain this information from the Defendant and his third party enablers, but these efforts have been unsuccessful.

5. The information held by GoDaddy.com llc, Domains by Proxy, Wordpress/Automattic Inc. NameCheap, and Bodis is not otherwise accessible and is crucial for establishing facts central to my case. Defendant and his enabler friends have moved the domain registration and hosting of the websites to multiple companies in an attempt to pervert the course of justice and not be held accountable for bad acts. Fortunately, after research and communication with above companies, they have located accounts and will provide documentation to Plaintiffs on receipt of a valid subpoena. The concern is that Defendant and or his friends will attempt to move the websites and domain names to yet another company in another country to inhibit Plaintiff further and avoid accountability. I was told by above companies that limited records are available once a domain and or hosting is moved to a new company, which proves difficult in obtaining records directly linking Defendant and his third party enablers to the websites ending in lies.info; lies.com; files.com
6. I believe that the issuance of these subpoenas is necessary to ensure a fair opportunity to present my claims and to secure relevant evidence.
7. I respectfully request that the Court grant my motion for subpoenas for the reasons stated above.

Dated: Broome County, New York

May 12, 2025

Respectfully submitted,

A handwritten signature in cursive script that reads "Jane Doe".

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Jane Doe